

Public Consultation - CFP Regulation Evaluation

Fields marked with * are mandatory.

Introduction

About this consultation

The purpose of this public consultation is to gather your input and views about the functioning of the common fisheries policy (CFP) Regulation ([Regulation \(EU\) No 1380/2013](#)) in order to support the evaluation of this Regulation.

This evaluation will consider how the existing CFP Regulation is performing to date and assess how the legal framework allows its current objectives to be met and address emerging challenges. It will cover all action within the EU and the external action of the CFP Regulation.

The evaluation will take stock of the CFP Regulation's impact in the conservation of marine biological resources and the management of fisheries and fleets exploiting such resources, the supply chain, consumers and public authorities in all EU Member States over the past 10 years of implementation (2014-2024), building on earlier consultations and input provided as preparation for the Commission Communication on the common fisheries policy today and tomorrow ([COM/2023/103](#))

The questions are organised around four of the five standard evaluation criteria used by the European Commission in order to assess the extent to which the CFP Regulation:

- is effective in fulfilling expectations and meeting its objectives;
- is efficient in terms of cost-effectiveness and proportionality of actual costs to benefits;
- is relevant to current and emerging needs;
- is coherent (internally and externally with other EU interventions or international agreements)

These criteria are [a set of principles](#) used by the European Commission to assess the quality and impact of policies and regulations to ensure that EU policies are well-designed, and that they deliver real benefits to citizens and businesses across the EU.

Please comment on any or all topics (you can skip questions if you have nothing to say) and provide any other information you think relevant.

At the end of the survey, you can upload a document or position paper (maximum size 3 MB) or link if your contribution is in html format. You can also provide additional comments or information.

About you

* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business
- Consumer organisation
- EU citizen
- Environmental organisation

- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

* First name

Marta

* Surname

Cavallé

* Email (this won't be published)

executive.secretary@lifeplatform.eu

* Organisation name

255 character(s) maximum

Low Impact Fishers of Europe

* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

335382815910-56

* Country of origin

Please add your country of origin, or that of your organisation.

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

- Afghanistan
- Djibouti
- Libya
- Saint Martin

- Åland Islands
- Albania
- Algeria
- American Samoa
- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Dominica
- Dominican Republic
- Ecuador
- Egypt
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Liechtenstein
- Lithuania
- Luxembourg
- Macau
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar/Burma
- Namibia
- Saint Pierre and Miquelon
- Saint Vincent and the Grenadines
- Samoa
- San Marino
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden

- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Türkiye
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States

- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena
Ascension and
Tristan da Cunha
- Saint Kitts and
Nevis
- Saint Lucia
- United States
Minor Outlying
Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and
Futuna
- Western Sahara
- Yemen
- Zambia
- Zimbabwe

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association', 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the [personal data protection provisions](#)

Effectiveness of the CFP Regulation

1. What impact do you think the CFP Regulation has had to?

| | Very positive | Positive | Neutral | Negative | Very negative | No opinion /No answer |
|------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|-----------------------|-----------------------|----------------------------------|----------------------------------|-----------------------|
| The contribution to the environmental sustainability and conservation of marine resources | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| The contribution to the economic sustainability of people active in the fisheries and aquaculture sectors and consumers | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Contributing to the social conditions (fair standard of living; training) of people active in the fisheries and aquaculture sectors and of consumers | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |

1a. What impact do you think the CFP Regulation has had on the contribution to the environmental sustainability and conservation of marine resources

| | Very positive | Positive | Neutral | Negative | Very Negative | No opinion /no answer |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|-----------------------|-----------------------|----------------------------------|-----------------------|----------------------------------|
| Helping to keep fish stocks at healthy levels or bring them back to those levels | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Contributing to healthy marine ecosystems (protecting young fish, the seabed, sensitive species such as marine mammals and seabirds and Natura 2000 sites and other marine protected areas and) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Contributing to international ocean governance in support of environmental sustainability | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Supporting animal health and welfare | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |

Please add any specific points you want to raise clarifying your above ranking

Article 2.2 of the CFP dealing with MSY applies to both fishing pressure and stock biomass, requiring that “all stocks are maintained or restored above levels capable of producing MSY (=BMSY)”. Yet, the current fisheries management approach in the EU is not geared towards delivering such stock recovery above BMSY. Rather, misinterpretation and misuse of the biological reference points have been constant in the design of the Multiannual Management Plans, especially in the Baltic, which keeps stocks around the lowest available biological reference points Btrigger and Blim, while predator/prey relationships and population structure of fish stocks, and natural mortality rates changes are constantly ignored when setting fishing limits.

This has meant that scientists have consistently overestimated biomass and set fishing levels too high, resulting in low and dysfunctional fish stocks which have already collapsed (like the Baltic Cod) or are now in serious decline (sprat and herring).

Contributing to healthy marine ecosystems and other objectives should be covered more though other European policies such as the Marine Strategy Framework Directive, Habitats and Bird Directives. However, appropriate coordination needs to be placed to make sure there is no incoherence on their implementation.

1b. What impact do you think the CFP Regulation has had on the contribution to the economic sustainability of people active in the fisheries and aquaculture sectors (owners, workers, employers, operators) and consumers

specifically on contributing to profitable activities:

| | Very positive | Positive | Neutral | Negative | Very negative | No opinion /No answer |
|--|---------------|----------|---------|----------|---------------|-----------------------|
| | | | | | | |

| | | | | | | |
|------------------------------------|-----------------------|-----------------------|-----------------------|----------------------------------|-----------------------|----------------------------------|
| in the fisheries catching sector | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| in the fisheries processing sector | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| In the fisheries marketing sector | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| in the aquaculture sector | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |

What impact do you think the CFP Regulation has had on supporting modernisation and innovation:

| | Very positive | Positive | Neutral | Negative | Very negative | No opinion /No answer |
|------------------------------------|-----------------------|-----------------------|----------------------------------|-----------------------|-----------------------|----------------------------------|
| in the fisheries catching sector | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| in the fisheries processing sector | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| In the fisheries marketing sector | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| in the aquaculture sector | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |

What impact do you think the CFP Regulation has had on the contribution to:

| | Very positive | Positive | Neutral | Negative | Very negative | No opinion /No answer |
|-------------------------------------------------------------------------------------------------------------------|-----------------------|----------------------------------|-----------------------|----------------------------------|-----------------------|-----------------------|
| Ensuring availability of food supplies at reasonable prices for consumers | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Supplying aquatic food to processors and consumers with adequate level of information | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Improving stability of the fishery and aquaculture market | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Ensuring fair competition conditions, between stakeholders of the fishery and aquaculture sector on the EU market | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Please add any specific points you want to raise clarifying your above ranking

In our responses to the whole questionnaire, we will just refer specifically to the small-scale fisheries sector we represent. However, we have to bear in mind that the CFP and its implementation (or lack of implementation) has impacted very differently to the SSF and LSF. In the case of profitability this has been significantly low to SSF, especially due to low levels of fish resources within their reach at sea, lack of access to markets and resources, among other causes.

On the modernisation and improved technology, the SSF is normally using the same technology as more than 10 years ago. There has not been concrete focus on this for this fleet until very recently when there is an interest from the commission to explore the energy transition or digitalisation. As a result, the fleet is an aging fleet, which now requires to be updated.

On the impact of the CFP on the availability of food supplies at reasonable prices, although in Europe there is no apparent food insecurity, we think that the continuous fish supply is more due to trade deals (example with Norway on the import of salmon, through the Fisheries Partnership Agreements and specific trade agreements with 3rd countries, rather than proper CFP implementation in the EU. This ended with EU food security to be dependent on imports and our fish stocks to be constantly reduced.

On the issue of “supplying food to consumers with an adequate level of information” we feel that even though there is good enough legislation in place (it can always be improved) there is no enforcement and minimal or proper implementation and the law, resulting in a lack of traceability, market dominance on a few established products, fishers being the weakest in the value chain, lack of SSF organisations and capacity, all contributing to a vicious circle. Especially, formal labels of the fish get lost across the value chain and there is significant mislabelling. In Spain, for instance, a study (Client Earth, 2018) on the compliance of the obligatory information display in fishery products revealed that 70% of the obligatory information is not provided, especially the production method (which was missing in 75% of the products) and fishing gear (which is excluded from 85% of the products), among others interesting data. Similarly, a study on labelling of seafood in retailers in Slovenia revealed that the vast majority of selling points were not compliant with the regulation, including the key information on fishing gear and fishing area. While the data collected by fishers is usually complete, the greatest loss of data and information occurs in the post-harvest stage, hindering informed consumer choices.

Consumers remain dependent on the popular species such as, European hake, giant red shrimp, swordfish, Gilthead seabream, European seabass and salmon. A big majority of these species are imported and come from other production systems such as aquaculture. Along with the parallel production by large-scale fisheries and aquaculture, the imports of fresh fish have posed challenges to the products of small-scale fisheries, especially in countries where the markets are small and easily saturated. Small-scale fishers are frustrated by the fact that their products are assimilated through the supply chain and treated like any other at best, while producing more positive externalities than the competitor.

1c. What impact do you think the CFP Regulation has had on contributing to the social conditions of people active in the fisheries and aquaculture sectors

Specifically, on ensuring a fair standard of living for the people active in the fisheries and aquaculture sectors (owners, workers, employers, employees, operators), including through a fair and stable income and decent working conditions

| | Very positive | Positive | Neutral | Negative | Very negative | No opinion /No answer |
|---------------------------------------|-----------------------|-----------------------|-----------------------|----------------------------------|-----------------------|----------------------------------|
| in the fisheries catching sector | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| in the aquatic food processing sector | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| In the aquatic food marketing sector | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| in the aquaculture sector | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |

What impact do you think the CFP Regulation has had on the following social aspects?

| | Very positive | Positive | Neutral | Negative | Very negative | No opinion /No answer |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|-----------------------|-----------------------|----------------------------------|----------------------------------|----------------------------------|
| Ensuring a fair allocation of fishing opportunities to fishers | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| Supporting small-scale fishers | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| Supporting small-scale aquaculture farmers | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Supporting coastal communities dependent on fishing and aquaculture | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Taking into account the interests of consumers by ensuring the availability of food supplies at reasonable prices, enabling informed choices and promoting responsible consumption | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Please add any specific points you want to raise clarifying your above ranking

Despite their high socio-economic importance, over the 4 decades of successive CFPs, the SSF sector has been an outlier, lacking dedicated representation at EU level, with limited access to fishing opportunities, sectoral support, and marketing structures. In the current CFP in particular, opportunities have been missed over the past decade to:

- address socio-economic inequality and lack of environmental sustainability through the allocation of fishing opportunities using criteria of an environmental, social and economic nature. The potential of Article 17 has only been partially explored, implemented so as to preserve the status quo and the economic stability of the large-scale fleet. Implementation has fallen short, in line with the letter of the law but not aspiring to serve the spirit of the law explicitly outlined in Recital 33, which states that: “Member States should promote responsible fishing by providing incentives to those operators who fish in the least environmentally damaging way and who provide the greatest benefits for society”. Instead, opportunities have been allocated to those who fish the most (based on catch history as main criteria used).
- provide better opportunities for small-scale low impact fishers to access sectoral support through collective projects financed by EMFAF while ending harmful subsidies that lead to overfishing and,
- provide support to SSF and their associations to establish dedicated SSF Fish Producer Organisations (POs) and other structures. Dedicated POs are key for the collective organisation of small-scale fishers, for achieving fair access to markets, for establishing sustainable and fair food systems, and as part of the solution to accessing fishing opportunities and marine spatial planning decisions, as recognised in the Commission's Report on the Implementation of the Common Market Organisation for fishery and aquaculture products: “It is well recognised that the small-scale Producer Organisations remains a challenge, that there is a need for a better structuring of small-scale fishers, the lack of appropriate administrative and/or financial support to establish SSF POs or that member states do not take sufficient account of their specificities laying down criteria for recognition”.
- Give preferential access for small-scale, artisanal or coastal fishers, as it was the spirit of the law explicitly mentioned in recital 19 of the CFP and to Preserve SSF's rights to access to fishing areas and resources and protect the sector from the encroachment of more powerful blue economy sectors. This not only has caused the demise of fish stocks and negatively impacted the wider marine environment but also a knock-on effect on generational renewal, causing a skewed demographic profile, with fishing populations ageing faster than average.

Efficiency of the CFP Regulation

A reminder:

The CFP regulation's objectives

“Long-term environmental sustainability” includes the sustainable exploitation of marine biological resources (through the use of maximum sustainable yield) as well as preserving marine habitats and sensitive species.

“Economic benefits” includes increased productivity, stable markets, availability of food supplies, reducing the Union market's dependence on food imports, reasonable prices for consumers, economic development in coastal areas and overall smart, sustainable and inclusive growth.

“Social and employment benefits” includes a fair standard of living for the fisheries sector including small-scale fisheries, improvement of safety and working conditions for fishing operators, direct and indirect job creation, as well as preservation of traditional fishing activities in dependent coastal communities.

2. How you would rate the contribution of the following elements of the CFP Regulation to achieving its objectives?

Contribution of **Maximum sustainable yield** on:

| | Very positive | Positive | Neutral | Negative | Very negative | No opinion/No answer |
|--------------------------|-----------------------|-----------------------|-----------------------|----------------------------------|----------------------------------|-----------------------|
| Environmental objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Economic objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Social objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |

Contribution of the **landing obligation** on:

| | Very positive | Positive | Neutral | Negative | Very negative | No opinion/No answer |
|--------------------------|-----------------------|-----------------------|-----------------------|----------------------------------|-----------------------|-----------------------|
| Environmental objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Economic objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Social objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Contribution of **Fleet capacity limits** on:

| | Very positive | Positive | Neutral | Negative | Very negative | No opinion/No answer |
|--------------------------|-----------------------|-----------------------|-----------------------|----------------------------------|-----------------------|-----------------------|
| Environmental objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Economic objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Social objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Contribution of **the multiannual plans** on:

| | Very positive | Positive | Neutral | Negative | Very negative | No opinion/No answer |
|--------------------------|-----------------------|-----------------------|-----------------------|----------------------------------|-----------------------|-----------------------|
| Environmental objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Economic objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Social objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Contribution of **regional cooperation on conservation measures via joint recommendations by the Member States** on:

| | | | | | | |
|--|--|--|--|--|--|--|
| | | | | | | |
|--|--|--|--|--|--|--|

| | Very positive | Positive | Neutral | Negative | Very negative | No opinion/No answer |
|--------------------------|-----------------------|-----------------------|----------------------------------|----------------------------------|-----------------------|-----------------------|
| Environmental objectives | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Economic objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Social objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Contribution of **adopting conservation measures necessary for compliance with obligations under EU environmental legislation** on:

| | Very positive | Positive | Neutral | Negative | Very negative | No opinion/No answer |
|--------------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|----------------------------------|
| Environmental objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Economic objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Social objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |

Contribution of **adopting Commission (conservation) measures in case of a serious threat to marine biological resources** on:

| | Very positive | Positive | Neutral | Negative | Very negative | No opinion/No answer |
|--------------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|----------------------------------|
| Environmental objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Economic objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Social objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |

Contribution of **Member State emergency measures** on:

| | Very positive | Positive | Neutral | Negative | Very negative | No opinion/No answer |
|--------------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|----------------------------------|
| Environmental objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Economic objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Social objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |

Contribution of **professional organisations, incl. producer organisations** on:

| | Very positive | Positive | Neutral | Negative | Very negative | No opinion/No answer |
|--------------------------|-----------------------|-----------------------|-----------------------|----------------------------------|-----------------------|-----------------------|
| Environmental objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

| | | | | | | |
|---------------------|-----------------------|-----------------------|-----------------------|----------------------------------|-----------------------|-----------------------|
| Economic objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Social objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Contribution of **allocation of fishing opportunities** on:

| | Very positive | Positive | Neutral | Negative | Very negative | No opinion/No answer |
|--------------------------|-----------------------|-----------------------|-----------------------|----------------------------------|-----------------------|-----------------------|
| Environmental objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Economic objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Social objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Contribution of **Sustainable Fisheries Partnership Agreements** on:

| | Very positive | Positive | Neutral | Negative | Very negative | No opinion/No answer |
|--------------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|----------------------------------|
| Environmental objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Economic objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Social objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |

Contribution of the **international and regional Fisheries management agreements** on:

| | Very positive | Positive | Neutral | Negative | Very negative | No opinion/No answer |
|--------------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|----------------------------------|
| Environmental objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Economic objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Social objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |

Contribution of the **management of stocks shared with third countries** on:

| | Very positive | Positive | Neutral | Negative | Very negative | No opinion/No answer |
|--------------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|----------------------------------|
| Environmental objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Economic objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Social objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |

Contribution of the **Commission strategic guidelines and Member States' multi-annual national strategic plans on aquaculture** on:

| | Very positive | Positive | Neutral | Negative | Very negative | No opinion/No answer |
|--------------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|----------------------------------|
| Environmental objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Economic objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Social objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |

Contribution of the **open method of coordination of Member States on aquaculture** on:

| | Very positive | Positive | Neutral | Negative | Very negative | No opinion/No answer |
|--------------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|----------------------------------|
| Environmental objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Economic objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Social objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Contribution of the **marketing standards** on:

| | Very positive | Positive | Neutral | Negative | Very negative | No opinion/No answer |
|--------------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|----------------------------------|
| Environmental objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Economic objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Social objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |

Contribution of **consumer information/ labelling rules** on:

| | Very positive | Positive | Neutral | Negative | Very negative | No opinion/No answer |
|--------------------------|-----------------------|-----------------------|-----------------------|----------------------------------|-----------------------|-----------------------|
| Environmental objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Economic objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Social objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Please add any specific points you want to raise clarifying your above ranking

- On Landing Obligation: Due to a lack of political will at MS level and within the sector, its provisions have hardly been implemented. Huge amounts of public money have been granted for the development of new, more selective, gear, especially for trawling, while in fact very few vessels have actually transitioned to these

new gears. The continuous delay in implementing the LO continues to aggravate the situation for fish stocks and ecosystems, encouraging misreporting, with resultant fisheries mis-management and the erosion of the resilience of all fishing sectors, especially the SSF fleet. Investing in supporting and encouraging those fishers that already transitioned to low impact selective fishing would have been more efficient as well as providing incentives for genuine change, in our view.

- On Fishing capacity. The fleet capacity ceilings are a very important and needed part of the CFP. However, there has been a failure to regulate fleet capacity ceilings, notably due to: inadequate engine power verification systems at Member State level or inadequate application of the law and a mixture of mismanagement and illegal activities, including falsified engine certificates and misinterpretation of laws (attached we include references on the review of the management of the motos power and gear from Danish Fisheries Agency in 2024, for example). Despite the reduction in vessel numbers over the years, the impact of the technological creep on fishing capacity has probably compensated for this, meaning that fleet capacity has not actually decreased as is claimed by many. This lack of information and clarity on the actual capacity of the EU fishing fleet is an obstacle to achieving CFP objectives. Similarly, there is a serious flaw in the way Member States report annually on the matching of fleet capacity to the available resources, which discriminates against the small-scale coastal fleet.

- On Producer Organisations. While the CFP has been very effective in promoting the association of LSF, their restrictive system excludes new and small-scale fishers from resource access. In existing POs normally there is no appropriate and representative participation of small-scale producers and in some cases, there has been exclusion to those willing to join. Instead, we believe dedicated POs are key for the collective organisation of small-scale fishers, for achieving fair access to markets, for establishing sustainable and fair food systems, and as part of the solution to accessing fishing opportunities and marine spatial planning decisions. However, the lack of appropriate administrative and/or financial support to establish SSF POs or that member states do not take sufficient account of their specificities laying down criteria for recognition. In addition to that, some countries have posed an unjustified maximum number of POs to be established in the country, and de facto excluded the analysis of proposals from SSF POs to be recognised.

- On allocation of fishing opportunities: Due to historic injustices, the SSF fleet is only able to access around 6% or less of the fishing opportunities. In the current CFP in particular, opportunities have been missed over the past decade to address socio-economic inequality and lack of environmental sustainability through the allocation of fishing opportunities using criteria of an environmental, social and economic nature. Article 17 has only been partially implemented, preserving the status quo and not serving the spirit of the law, with opportunities allocated to those who fish the most (based on catch history) rather than to those who fish more sustainably (selectively, lower carbon footprint, with a low environmental impact) or in a more socio-economically beneficial way (jobs created, income generated). By applying transparent and objective criteria of an environmental, social and economic nature to the allocation of fishing opportunities, as laid down in Article 17, sustainable practices can be rewarded and a shift towards low-impact fishing encouraged.

Governance

A reminder: Governance

The CFP regulation states that the management of fisheries should be guided by principles of good governance, including principles such as:

- Decision-making based on best available scientific advice;
- Broad stakeholder involvement, in particular advisory councils*, in all stages of the decision-making process;
- Taking into account regional specificities through a regional approach;
- Transparency and coherence between the internal and external dimension of the CFP.

- The clear definition of responsibilities at the Union, regional, national and local levels;

*Advisory Councils are stakeholder-led organisations that provide the Commission and EU countries with recommendations on fisheries management matters.

3. How effective is the governance system of the CFP Regulation towards reaching environmental, social or economic sustainability?

| | Very effective | somewhat effective | Neutral | Somewhat ineffective | Not effective at all | No opinion /No answer |
|------------------------------|-----------------------|-----------------------|-----------------------|----------------------------------|-----------------------|-----------------------|
| Environmental sustainability | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| social sustainability | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Economic sustainability | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Please add any specific points you want to raise clarifying your above ranking

Getting the governance right is one of the key challenges facing fisheries today. The challenge is ever more complex given the development of the blue economy and the need to accommodate new economic sectors (aquaculture, tourism, renewable energy, etc.) within areas traditionally occupied by fisheries.

Although Regionalisation and increased stakeholder involvement are key elements highlighted in the current CFP, and constituted improvements with respect to previous CFPs, its implementation is not done effectively and sufficiently. Stakeholder involvement is basically done by formal consultations and advise in key moments, rather than having a continuous and meaningful engagement in all stages, from the policy design up to its implementation.

On the issue of getting the advice of stakeholders through the ACs, although the EC has laid down detailed rules on the functioning of the ACs in Delegated Regulation EU 2015/242 of October 2014, highlighting that “it is necessary to ensure small-scale fisheries (SSF) efficient participation in the work of the Advisory Councils, including by contributing to the costs and loss of income that such participation may entail”, and emphasising “The number of representatives of small-scale fleets should reflect the share of small-scale fleets within the fishing sector of the Member States concerned”, and while specific financial support in the past for the improved engagement of the SSF in the ACs were proven to be quite effective, there remain barriers when it comes to the participation of SSF in most of the existing ACs, and several SSF organisations previously engaged are dropping their participation as they don’t see it’s worth the effort. These reasons include the lack of dedicated SSF organisations due to reasons appointed above, but when they exist, their voice is still prevented to be heard appropriately. While small-scale coastal fishery (SSCF) stakeholders in the under 12 metre vessel fleet using non-towed gear are currently represented through various associations in a range of advisory councils, normally through mixed fleet member organisations, in our experience, the representation of dedicated small-scale fishing interests and the stakeholder engagement from this fleet segment is limited. Across the existing 11 Advisory Councils, the ExCom Chair, General Assembly Chair and Working Group Chairs rarely, if ever, come from dedicated small-scale fishing associations or producer organisations. Notably, in most of the ACs we have found an impenetrable barrier that prevented SSF delegates from joining the ExComs, even despite the existence of dedicated empty seats to SSF. This has the effect that in final ACs advice SSF views are not appropriately taken into account and that in stakeholder consultation meetings with the Commission and Member States or the regular dialogues there are few -if any- small-scale fishing representatives at the table. Also, this frustration over the

years has brought many SSF to finally drop their participation at the ACs as they don't see worthed the effort.

To redress the problem of the lack of engagement of the SSF, it is vital that the SSF sector is supported to establish appropriate dedicated small-scale Fish Producer Organisations (POs) as mentioned in the first point. In parallel, building on the work of the existing 11 advisory councils, which represent a range of geographical areas, fleet segments and fishery stakeholder interests, we feel it is necessary and timely to launch an additional AC dedicated to Small-scale Fishing.

On another note, Co-management is not particularly addressed in the current CFP but neither are MS prevented from adopting this approach in their waters. Certain Member States and regions have a legal framework for co-management; to date, however, there is no legislation at European level and only a few tools facilitating the implementation of co-management (or participative management) mechanisms, although co-management is being used to manage some fisheries in a number of EU Member States, applying rules that fit in perfectly with the current CFP. The general principle of fisheries co-management can be facilitated through support and guidelines at both European and national level, as the European Parliament Resolution on "co-management of fisheries in the EU and the contribution of the fisheries sector for the implementation of management measures" (2022/2003(INI)), stated.

4. How effective is the CFP Regulation's governance system in achieving the following:

| | Very effective | somewhat effective | Neutral | Somewhat ineffective | Not effective at all | No opinion / unfamiliar with topic |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|----------------------------------|-----------------------|----------------------------------|-----------------------|------------------------------------|
| In collecting scientific advice | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| In using scientific advice to inform its policy decisions | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| In involving stakeholders at all stages of the policy-making process | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| In empowering stakeholders through professional organisations, in particular producer organisations, to implement the CFP | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| In managing EU fish stocks in a sustainable way | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| In managing shared fish stocks in a sustainable way | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| In managing fish stocks at international level in a sustainable way contributing to international ocean governance | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| In managing aquaculture in a sustainable way | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| In contributing to healthy marine ecosystems (protecting young fish, the seabed, Natura 2000 sites and other marine protected areas, sensitive species such as marine mammals and seabirds) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| In providing sufficient flexibility to adapt to regional differences: in the European sea basins (Baltic Sea, North Sea, North Western Waters, South Western Waters, Mediterranean Sea, Black Sea) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| In providing sufficient flexibility to adapt to regional differences: in the outermost regions | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| In ensuring transparency in decision making? | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Please add any specific points you want to raise clarifying your above ranking

Article 2.2 of the CFP dealing with MSY applies to both fishing pressure and stock biomass, requiring that “all stocks are maintained or restored above levels capable of producing MSY (=BMSY)”. Yet, the current fisheries management approach in the EU is not geared towards delivering such stock recovery above BMSY. Rather, misinterpretation and misuse of the biological reference points have been constant in the design of the Multiannual Management Plans, especially in the Baltic one, which keeps stocks around the lowest available biological reference points Btrigger and Blim, while predator/prey relationships and population structure of fish stocks, and natural mortality rates changes are constantly ignored when setting fishing limits.

This has meant that scientists have consistently overestimated biomass and set fishing levels too high, resulting in low and dysfunctional fish stocks which have already collapsed (like the Baltic Cod) or are now in serious decline (sprat and herring).

5. To what extent has legal enforcement action at EU level (EU Pilots and infringements) contributed to ensuring compliance with the CFP Regulation?

- Very effective
- Effective
- Neutral
- not very effective
- ineffective
- No opinion/ unfamiliar with the topic

Please add any specific points you want to raise clarifying your above ranking

While the CFP has many of the key necessary elements to deliver its objectives, the partial implementation of successive Common Fisheries Policies (CFPs) has led to a distorted sea, with most of our stocks being overexploited and fishing capital, access to fishing opportunities, and influence concentrated in ever fewer hands. This is putting European food sovereignty at risk, and compromising the future prospects of coastal communities.

Effectiveness and Efficiency

6. How would you rate the following elements that could challenge the successfulness of the CFP Regulation (i.e. achieving objectives)?

| | Very important | Important | Neutral | Unimportant | Not important at all | No opinion / unfamiliar with topic |
|--------------------------------------------------------------------------------------------------------------|----------------------------------|----------------------------------|----------------------------------|----------------------------------|-----------------------|------------------------------------|
| Complexity of CFP legal requirements | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Inconsistent or lack of control and enforcement | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Lack of flexibility of the legal framework at EU level | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Lack of flexibility of the legal framework at regional sea-basin level | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Lack of flexibility of the legal framework at national level | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Difficulties in implementing new technology and innovation to meet CFP objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Deviation from scientific advice when adopting fisheries conservation measures | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Challenges in implementing regionalisation for fisheries measures to contribute to environmental obligations | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Exemptions to the landing obligation | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Lack of attractiveness of the sector: for workers | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Lack of attractiveness of the sector for fishers and aquaculture producers | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Lack of attractiveness of the sector: for investors | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Unfair competition | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Regional disparities within the EU | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

| | | | | | | |
|-------------------------------------------------------------------|-----------------------|----------------------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Contribution to food security | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Lack of predictability for: Availability of fishing opportunities | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Lack of predictability for: Climate change and weather conditions | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Lack of predictability for: Market conditions | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

7a. To what extent do you consider the compliance costs generated by the CFP Regulation, including administrative burden, as:

| Compliance cost (all direct cost): | High | Somewhat high | Acceptable | Somewhat low | Low | No opinion / unfamiliar with topic |
|------------------------------------|----------------------------------|-----------------------|-----------------------|-----------------------|-----------------------|------------------------------------|
| in the catching sector | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| in the processing sector | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| in the aquaculture sect | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| for national public authorities | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| For EU public authorities | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |

Administrative burden (reporting, registration, labelling etc.)

| Administrative burden (reporting obligations, registration, labelling etc.) | High | Somewhat high | Acceptable | Somewhat low | Low | No opinion / unfamiliar with topic |
|-----------------------------------------------------------------------------|----------------------------------|-----------------------|-----------------------|-----------------------|-----------------------|------------------------------------|
| in the catching sector | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| in the processing sector | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| in the aquaculture sect | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| for national public authorities | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| For EU public authorities | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |

Please justify your answer, in particular if you considered these costs high (or unreasonably) by specifying them.

Normally, the administrative burden in terms of reporting obligations, registration, labelling, security checks, etc. are quite similar irrespective of the fleet segment and size of the company, their volume of landings and its capacity. This means that time, effort and money invested is disproportionately high in small-scale fishers compared to the larger scale companies. Role of some support organisations is essential but not always an SSF account with the necessary support in this regard. There is a need for a deregulation of small business with low volume landings and simplification on the amount of reporting.

7b. According to your view, which areas of the CFP Regulation have potential for simplification and cost reduction?

- Measures for the conservation and sustainable exploitation of marine biological resources

- Common market organisation
- Aquaculture
- Control and enforcement
- Governance
- External policy
- No such area

To specify: Measures for the conservation and sustainable exploitation of marine biological resources, simplification and cost reduction potential areas

- Rules on access to waters
- Adoption of Conservation measures, including technical measures
- Fishing capacity management
- Scientific base for fisheries management/data collection

Could you please briefly elaborate on your selection?

Relevance of the CFP Regulation

9. To what extent do you agree that the objectives of the CFP Regulation have remained relevant over the past 10 years / implementation period?

| | Fully relevant | Somewhat relevant | Neutral | Somewhat irrelevant | Fully irrelevant | No opinion / unfamiliar with topic |
|------------------------------------------------------------------------------------------|----------------------------------|-----------------------|-----------------------|-----------------------|-----------------------|------------------------------------|
| Fostering "Long-term environmental sustainability of fishing and aquaculture activities" | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Ensuring "Economic benefits" | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Ensuring "Social and employment benefits" | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Contributing to the availability of food supplies | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Pursue the objectives at international level | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Please add any specific points you want to raise clarifying your above ranking

Are there specific needs missing in your opinion, that are not sufficiently addressed in the current CFP Regulation and its objectives, if so, which?

The objectives should specify that fish for direct consumption is prioritised and European catches used for fishmeal and fish oil should be limited. Objectives should also include reference to fairness, including the promotion of gender equity, access to the sector for youth and new entrants in order to support generational renewal. MSP and coherence between CFP a Blue economy development also needs inclusion in the objectives.

10. To what extent do you consider that the following challenges, raised in different stakeholder fora or recommendations, are sufficiently addressed today by the CFP Regulation

| | Sufficiently addressed | Somewhat addressed | Neutral | Somewhat not addressed | Not addressed at all | No opinion / unfamiliar with topic |
|--------------------------------------------------------------------------------------------------------------------------------------------|------------------------|----------------------------------|----------------------------------|----------------------------------|----------------------------------|------------------------------------|
| Brexit and its effect on the implementation | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Governance of commonly shared or managed stocks | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Impact of climate change / mitigation and adaptation (e.g. stock migration, natural disasters, invasive species, acidification, heatwaves) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| Impact of biodiversity loss including loss of ecosystem services | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Pollution, including eutrophication of waters leading to oxygen-deprived marine areas ('dead zones') | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| Unstable geopolitical context | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| International competition (eg. economic, market, technological, access to resources) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Inflation and rising operational costs including energy costs | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Investment capacity, including for the energy transition and modernisation of vessels and equipment | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Unstable markets and price volatility | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Digital transition | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Behavioural changes and shift in consumption patterns | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Labour shortage | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Recreational fisheries | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

| | | | | | | |
|-------------------------------------------|-----------------------|-----------------------|-----------------------|----------------------------------|----------------------------------|-----------------------|
| Competition for space | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Management of inland waters | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| Challenges of small-scale coastal fishing | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Prevention of food loss and food waste | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Animal welfare | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Please add any specific points you want to raise clarifying your above ranking

Although many of the issues being raised here are marked as not sufficiently addressed, few of them should be addressed through different complementary Regulations. Ocean Pact should ensure the best coherent approach to the overarching issues that can affect Fisheries and the Ocean in general. Others, especially the challenges of SSF, are key issues that CFP should deal with more directly and should be fully integrated. In this particular case a differentiated approach to SSF-LSF fisheries is essential.

11. To what extent are the objectives of the current CFP Regulation coherent with the following policies?

A. In relation to other EU fisheries law:

| | Very coherent | Coherent | Neutral | Rather incoherent | Incoherent | No opinion / unfamiliar with topic |
|----------------------------------------------------------|-----------------------|----------------------------------|-----------------------|-----------------------|-----------------------|------------------------------------|
| Control and monitoring | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Fight against Illegal unreported and unregulated fishing | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Rules on the external fleet | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Scientific data collection | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Common market organisation | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

B. In relation to other EU policies and laws:

| | Very coherent | Coherent | Neutral | Rather incoherent | Incoherent | No opinion / unfamiliar with topic |
|-----------------------------------------|-----------------------|----------------------------------|-----------------------|----------------------------------|-----------------------|------------------------------------|
| Habitats and Birds Directives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Nature restoration law | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Water Framework Directive | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Marine Strategy Framework Directive | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Marine and inland waters | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Maritime spatial planning | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| EU biodiversity strategy | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Food loss and waste prevention | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Food safety and Health | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Common Agricultural Policy | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Working conditions and labour standards | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

C. In relation to international action:

| | Very coherent | Coherent | Neutral | Rather incoherent | Incoherent | No opinion / unfamiliar with topic |
|--------------------------------------------------------------------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|------------------------------------|
| Synergy with development policy and recognition of developing countries' needs | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Sustainable and fair trade | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Protection of biodiversity | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Promoting international ocean governance | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| On climate change | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| UN Agreement on Marine Biodiversity of Areas beyond national jurisdiction | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| UN Sustainable Development Goals | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| FAO Code of Conduct for Responsible Fisheries | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| FAO Guidelines for Sustainable Aquaculture | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |

Please add any specific points you want to raise clarifying your above ranking, or add any missing policies or themes you want to raise.

The incoherence of the CFP and other policies is not a generalised issue, but rather something that needs to be looked at in detail on specific articles and premises. Normally is the lack of implementation or enforcement that leads to incoherences.

In the International action, Voluntary Guidelines for Small-scale Fisheries should be an element that could guide best implementation of the CFP and should be referred to and followed.

Any further comments?

12. Would you like to be contacted for a more in-depth interview if certain elements are not covered by this consultation – if so, please elaborate on which topic(s) and why.

Yes, very happy to be contacted for more in-depth interviews, especially anything related to the SSF interest which is more our area of expertise.

If you are open for a possible interview with DG MARE please leave you email address in the textbox below:

executive.secretary@lifeplatform.eu

Have you any further comments on these questions? Or was there a topic regarding the CFP not yet covered?

The questionnaire was a bit complex to answer as many answers need some degree of nuancing. More importance should be looked at the explanations referred in the space provided and the attached document.

Please upload your file(s) you want to share

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

1ef0e875-59b3-4ef5-a20d-68af6fda0f9b/LIFE_attachment_CFP_evaluation_consultation.pdf

Thank you for taking the time to fill in this questionnaire. Your input is much appreciated.

Contact

MARE-D3@ec.europa.eu



Evaluation of the Common Fisheries Policy 2025

Attachment to the questionnaire

Submission of the Low Impact Fishers of Europe

Transparency register number: 335382815910-56

Introduction

The Low Impact Fishers of Europe (LIFE) is an EU-wide platform of European associations of small-scale fishers (SSF) committed to fishing in a low impact manner and to providing socio-economic benefits to their communities. Our aim is to unite small-scale fishers to achieve fair fisheries, healthy seas and vibrant communities. Currently, LIFE represents 34 national and local level associations from 15 member states, incorporating around 10.000 fishers.

This submission addresses the experience of the under 12 metres polyvalent mostly passive gear fleet, characterised by relatively low volume catches (10s to 100s of kgs) with high-value addition (fresh fish on ice, catch of the day); relatively short range (within the 6 to 12-mile zone, with a trip duration of a few hours, generally no longer than 12 hours); self-employed owner-operators, with fishing crews paid on a share basis; micro or nano-enterprises, with relatively low turnovers (10s to 100s thousand Euro per annum); relatively low wages, with high levels of unpaid or partially paid labour; highly seasonal, weather dependent activities. This sector represents 70 to 80% of the vessel fleet by numbers, and 40-50% of the seagoing jobs.

10 years after the adoption of the reformed Common Fisheries Policy (CFP) in 2013 and its implementation in 2014, its main goals, especially those to “ensure the long-term sustainability for fisheries” and a “fair standard of living for fisheries communities”, are not being delivered. This is especially true for the small-scale low-impact fleets across the EU. Although there is many elements in the Regulation that are (and remain) very relevant, the major cause is that the reformed CFP is being poorly implemented by Member States, without maintaining the spirit of the law, serving majorly large-scale short-term interests, leading to a distortion of the seas, with most stocks being overexploited and fishing capital, access to fishing opportunities, and influence concentrated in ever fewer hands. This is putting European food security and sovereignty at risk, and compromising the future prospects of coastal communities.

1. Failure of the CFP to contribute to a fair standard of living for those who depend on fishing activities, bearing in mind coastal fisheries and socio-economic aspects

State of Play: how things stand

Despite their high socio-economic importance, over the 4 decades of successive CFPs, the Small-scale fisheries sector has been an outlier, lacking dedicated representation at EU level, with limited access to fishing opportunities, sectoral support, and marketing structures. In the current CFP in particular, opportunities have been missed over the past decade to:



- address socio-economic inequality and lack of environmental sustainability through the allocation of fishing opportunities using criteria of an environmental, social and economic nature. The potential of Article 17 has only been partially explored, implemented so as to preserve the status quo and the economic stability of the large scale fleet. Implementation has fallen short, in line with the letter of the law but not aspiring to serve the spirit of the law explicitly outlined in Recital 33, which states that: *“Member States should promote responsible fishing by providing incentives to those operators who fish in the least environmentally damaging way and who provide the greatest benefits for society”*. Instead, opportunities have been allocated to those who fish the most (based on catch history as main criteria used). In addition, the possibility for Member States to establish ITQ system under Article 16 which effectively meant the privatisation of these resources, have concentrated resources and power even more, excluding new entrants and undermining generational renewal.
- provide better opportunities for small-scale low impact fishers to access sectoral support through collective projects financed by EMFAF while ending harmful subsidies that lead to overfishing and,
- provide support to SSF and their associations to establish dedicated SSF Fish Producer Organisations (POs) and other structures. In existing POs normally there is no appropriate and representative participation of small-scale producers and in some cases there has been exclusion to those willing to join. Instead, we believe dedicated POs are key for the collective organisation of small-scale fishers, for achieving fair access to markets, for establishing sustainable and fair food systems, and as part of the solution to accessing fishing opportunities and marine spatial planning decisions. This has been proven in 3 existing dedicated SSF POs that managed to be created, recognised and linked to funding schemes. However, as recognised in the Commission's [Report on the Implementation of the Common Market Organisation for fishery and aquaculture products](#): *“It is well recognised that the small-scale Producer Organisations remains a challenge, that there is a need for a better structuring of small-scale fishers, the lack of appropriate administrative and/or financial support to establish SSF POs or that member states do not take sufficient account of their specificities laying down criteria for recognition”*. In addition to that, some countries have posed an unjustified maximum number of POs to be established in the country, and de facto excluded the analysis of proposals from SSF POs to be recognised.
- Give preferential access for small-scale, artisanal or coastal fishers, as it was the spirit of the law explicitly mentioned in recital 19 of the CFP, and to preserve SSF’s rights to fair and equal access to waters and resources and for these rights to be protected from the encroachment of more powerful blue economy sectors. While article 5 and article 20 of the Basic Regulation allows for Member States to take provisions that secure access to vessels that traditionally fish in the local 12 nautical mile zone this has proved insufficient to contribute to a fair standard of living and support the needs of the SSF who require abundant fish stocks with a stock comprised of a healthy population of large individuals. The partial implementation of article 2 and the counterproductive interpretation of *“maintaining populations of fish stocks above biomass levels capable of producing maximum sustainable yield”* by the Commission and some Member States



has meant that yields and SSB across the EU, and in particular in inshore waters, have declined. If the strategy that fish stocks are maintained at low levels with a low target biomass and high level of fishing mortality continues, then preferential access in the 12 nautical mile zone will continue to be ineffective in delivering on the socio-economic aspects of the CFP.

This has not only caused the demise of fish stocks and negatively impacted the wider marine environment, but also with a knock-on effect on the viability of the SSF fishing sector, on generational renewal, causing a skewed demographic profile, with fishing populations ageing faster than average.

What is needed

LIFE has always advocated that a differentiated policy and management approach to small- and large-scale fisheries would enable the establishment of a more level playing field, fairer and more sustainable fisheries, as postulated by the 2009 Green Paper on the Reform of the CFP (COM (2009) 163 final). With this in mind, and in the absence of concrete guidelines and an implementation plan from the European Commission to Member States on how to make sure there is adequate implementation of the CFP in the spirit of the law and in achieving a fair level playing field for the small-scale fishing fleet, LIFE advocates for the following actions:

- a) amending Article 5.2 as follows: In the waters up to 12 nautical miles from baselines under their sovereignty or jurisdiction, Member States shall be authorised to restrict fishing to fishing vessels *whose engine power does not exceed 221 kW using towed gears (as defined Article 6.12 regulation EU 2019/1241)* and that traditionally fish in those waters from ports on the adjacent coast, ~~without prejudice to the arrangements for Union fishing vessels flying the flag of other Member States under existing neighbourhood relations between Member States and the arrangements contained in Annex I,~~ fixing for each Member State the geographical zones within the coastal bands of other Member States where fishing activities are pursued and the species concerned. Member States shall inform the Commission of the restrictions put in place under this paragraph.
- b) the addition of a new paragraph 5.5, as follows: “Member States shall ensure preferential access for the small-scale fishing fleet within the 12 nautical mile coastal zone”

In the same vein, LIFE calls for an amendment to Article 17, with the addition of a second paragraph as follows:

- 17.2 Ensure a fair allocation to the small-scale fleet
 - a) To ensure an equitable distribution of fishing opportunities, Member States shall establish a fixed allocation, ring fenced, of dedicated fishing opportunities of at least 20% of the total including both TAC share and effort, to the small-scale fishing fleet.
 - b) This minimum allocation is not a ceiling, and in cases where the current share allocated to the small-scale fleet exceeds this threshold, it shall be maintained or increased.



c) Member States shall progressively reach this minimum by 2030, reporting annually to the EU Commission on progress and consulting regularly with stakeholders”.

To ensure the effective implementation of these amendments, an additional definition should be added to Article 4 on Definitions as follows:

- “Small-scale fishing: fishing activities carried out by a) marine and inland fishing vessels of an overall length of less than 12 metres and not using towed gear as defined in point (1) of Article 2 of Council Regulation (EC) No 1967/2006; or (b) fishers on foot, including shellfish gatherers”.
- “Fishing opportunity: an entitlement granted to a fishing company to capture designated species in a certain geographical fishing area, expressed in terms of catch weight, fishing effort (kW hours) and/ or reserved fishing space”.

In addition, it is vital that the SSF sector is supported to establish appropriate dedicated small-scale Fish Producer Organisations (POs), where value added or fishers represented rather than volume is the main criteria. The principle of “leave no one behind” should apply, with MS bound to ensure that nobody is excluded from joining a PO on the basis of size. MS should not place any restrictions on the number of POs that can be established in their country, so long as they meet the necessary criteria. Currently the CMO is unable to provide an enabling policy framework for SSF to succeed in setting up such dedicated POs. This will require the development of specific criteria appropriate for the establishment of dedicated small-scale Producer Organisations.

LIFE calls for Articles 6.2 and 22.2 of the CMO to be amended with the objective to reduce the administrative and financial burden and to provide appropriate support for the recognition of dedicated SSF Producer Organisations:

- “Article 6.2 Member States shall support the creation, recognition and operation of dedicated Small-scale Fisher Producer Organisations by establishing specific and appropriate requirements in line with the requirements of Articles 14 and 17, and based on value of catches or number of small-scale fishers. The number of SSF POs created shall not be limited in any member State”.
- “Article 22.2 For the purposes of point (a) of paragraph 1, a fishery producer organisation is considered to be representative where it accounts for at least 55 % of the quantities marketed of the relevant product during the previous year in the area in which it is proposed to extend the rules. *For a dedicated SSF Producer Organisation, it would be considered representative where it accounts for at least 55% of the value of catches from or involves 55% of the number of vessels in the small-scale sector in the area*”.

As evidence we submit

- a. The LIFE and Our Fish Report on “How the EU can Transition to Low Environmental Impact, Low Carbon, Socially Just Fishing” - <https://lifeplatform.eu/eu-holds-key-to-just-transition-to-low-carbon-low-impact-fishing-industry-report/>



- b. LIFE's report on "The Pros and Cons of Creating Producer Organisations (PO) for Mediterranean Small-Scale Fishers" - <https://lifeplatform.eu/wp-content/uploads/2021/06/LIFE-Producer-Organisations-PO-Guidelines-EN.pdf>
- c. [Market Opportunities for Artisanal and Small-Scale Fisheries Products for Sustainability of the Mediterranean Sea: Towards an Innovative Labelling Scheme.](https://lifeplatform.eu/wp-content/uploads/2021/02/LAB-Maff-report.pdf) <https://lifeplatform.eu/wp-content/uploads/2021/02/LAB-Maff-report.pdf>
- d. Client Earth (2018). Comprando productos del mar. Lo que no nos cuentan. 1-49

2. Failure to set fishing levels capable of building healthy stocks

The State of Play

Article 2.2 of the CFP dealing with MSY applies to both fishing pressure and stock biomass, requiring that "all stocks are maintained or restored above levels capable of producing MSY (=BMSY)". Yet, the current fisheries management approach in the EU is not geared towards delivering such stock recovery above BMSY. Rather, misinterpretation and misuse of the biological reference points have been constant in the design of the Multiannual Management Plans, especially in the Baltic one, which keeps stocks around the lowest available biological reference points Btrigger and Blim.

Actually, the current system allows for stocks to be assessed as within the MSY range when they have been depleted to just 20% of their pristine biomass (B0 levels). This is highly misleading and creates a sense that the Commission is not supporting the needs of coastal fishers. A more growth oriented perspective is necessary whereby stocks are, as a rule, fished in accordance with levels that will deliver a SSB equal to 50% of B0. Scientific advice that is requested for by the Commission needs to contain the possibility to grow fish stocks in excess of Btrigger, which is a lower biomass threshold than is used across most of the world, even lower than that recommended by the FAO.

In addition, the equation behind the quota calculations is not of sufficient quality, with the consequence of predator/prey relationships and population structure of fish stocks, and natural mortality rates changes being constantly ignored when setting fishing limits.

At present, the quota recommendation is based on the total mortality on the stock, F (fishing mortality) + M (natural mortality), that will allow for the SSB to remain within the Btrigger range, which is capped based on the probability of the stock declining below Blim in the forthcoming year. A significant issue is that M is not calculated on an annual basis. In the case of Baltic cod there was a significant increase in natural mortality due to predation from seals, a lack of prey availability and unfavourable environmental conditions. Despite this, M was assumed as a constant variable leading to wildly inflated F values and quota recommendations that contributed to the collapse of the stock. Despite the fishery being closed since 2019 lessons have not been learned but the same scientific assumptions are still in place.

The essence of the problem comes from a desire to fish all commercial stocks at Fmsy simultaneously, regardless of their relative commercial value or their role in the ecosystem,



while using scientific advice based on single-species models that do not account for subpopulations within the stock, trophic interactions within the ecosystem and also ignoring the age and size structure of the stock and subsequent impact on stock productivity and reproductive success. It is impossible to fish all stocks at 100% of F_{msy} at the same time and this will lead to stocks falling below B_{lim} with regularity, as has been seen since 2014.

All this has meant that scientists have consistently overestimated biomass and set fishing levels too high, resulting in low and dysfunctional fish stocks which have already collapsed (like the Baltic Cod) or are now in serious decline (sprat and herring). EU catches have declined as well as the total available SSB since the MSY policy was implemented.

What is needed

The CFP is very clear on the need to restore and maintain populations of fish stocks above biomass levels capable of producing MSY. It's rather an issue of addressing the incoherence between policy and practice in fisheries management. It's important to revise the way that scientific advice is provided and deal with the management shortcomings that undermine fish stock growth and penalise low impact fishery methods. The scientific advice must provide recommendations that allow for stocks that contain more fish, bigger fish and older fish. More concretely utilise BMSY as the standard reference point for stock management and as an objective when managing fisheries stocks. This includes a clearer focus on fish for direct human consumption.

Clarity is also needed on the different terms used and their definitions. In this regard, it is important that the "precautionary approach" should be defined and or replaced with the precautionary principle. Also, ecosystem-based approach should be included as a guiding principle but would need to be defined to avoid later misinterpretations or misuse.

An ecosystems approach should take account of predator/prey relationships, sustaining marine trophic structures and the cumulative impacts of fishing on the wider ecosystem. Fish stocks at lower trophic levels, prey species, should be fished at a maximum of 50% of F_{msy} in order to support energy transfers throughout the ecosystem and ensure prey availability. In addition, quotas should be set so that stocks can be grown to B_{msy} levels which are based upon stock sizes being 50% of their B_0 levels. In the absence of B_{msy} or B_0 values then a proxy value of 200% of $B_{trigger}$ can be used.

As evidence, we cite

- e. the conclusions of the workshop organised by LIFE on the Baltic Sea Emergency, June 26 2024: <https://lifeplatform.eu/21042-2/>
- f. LIFE's response to the Consultation on the EC's proposal to modify the Baltic Sea MAP: <https://lifeplatform.eu/life-responds-to-the-public-consultation-on-the-european-commissions-proposal-to-modify-the-multiannual-plan-map-for-the-baltic-sea/>
- g. Specific scientific research on this topic:
 - i. Including older fish in fisheries management: A new age-based indicator and reference point for exploited fish stocks: <https://onlinelibrary.wiley.com/doi/full/10.1111/faf.12789>



- ii. Rethinking sustainability of marine fisheries for a fast-changing planet: <https://fishbase.de/rfroese/GoldenRules2024.pdf>
- iii. Taking stock of global fisheries
- iv. Current stock assessment models overestimate productivity and recovery trajectory: <https://www.science.org/doi/10.1126/science.adr5487>

3. Failure to implement the Landing obligation and regulate fleet capacity ceilings

The State of Play

Due to a lack of political will at MS level and within the sector, its provisions have hardly been implemented. Huge amounts of public money have been granted for the development of new, more selective, gear, especially for trawling, while in fact very few vessels have actually transitioned to these new gears. The continuous delay in implementing the LO continues to aggravate the situation for fish stocks and ecosystems, encouraging misreporting, with resultant fisheries mis-management and the erosion of the resilience of all fishing sectors, especially the SSF fleet.

On the other hand, there has been a failure to regulate fleet capacity ceilings, notably due to:

- inadequate engine power verification systems at Member State level or inadequate application of the law
- a mixture of mismanagement and illegal activities, including falsified engine certificates and misinterpretation of laws.

Despite the reduction in vessel numbers over the years, the impact of the technological creep on fishing capacity has probably compensated for this, meaning that fleet capacity has not actually decreased as is claimed by many. This lack of information and clarity on the actual capacity of the EU fishing fleet is an obstacle to achieving CFP objectives.

The issue of capacity and fishing effort are closely linked, and the use of fishing days as the basic unit of fishing effort can be misleading. In particular, year on year, the STECF Annual Economic Report has stated that the SSF fleet accounts for the lion's share of the fishing effort of the EU fishing fleet based on days at sea. Such a statement assumes that one fishing day of a small-scale vessel, catching tens, or at most, hundreds of kilos per day is equivalent to that of a trawler or super trawler catching several tonnes or hundreds of tonnes per day.

Similarly, there is a serious flaw in the way Member States report annually on the matching of fleet capacity to the available resources, which discriminates against the small-scale coastal fleet. The SSF is routinely described as having overcapacity in fisheries where biomass has seen significant declines, while the contribution of SSF to fishing mortality is marginal compared to larger scale fleets. It is perverse that the SSF which makes a relatively minor contribution to total mortality, can be classified as having overcapacity; whereas fisheries, for example herring and sprat in the Baltic, where the more industrial fleet has the capacity to fish the quota 10 times over, is assessed as not having overcapacity. We need to recall also that there are implications for EMFAF availability, as financing can be tied to conditions regarding overcapacity in a given fishery.



What is needed

Investing in supporting and encouraging those fishers that already transitioned to low impact selective fishing would have been more efficient as well as providing incentives for genuine change, in our view, through -for example- article 17. LIFE fully supports the objectives to reduce environmental impacts of fishing and end discards, and we feel that legislating for more diversified, polyvalent, seasonally sound and selective fishing (right gear, right time, right place) is part of the solution to end discards. At the same time, high impact gears with unacceptably high by-catch rates and which cause the most damage to seabed, to fish habitats and marine ecology should be phased out.

For effective fisheries management we need better tools for measuring capacity and fishing effort, and better ways of expressing capacity and effort in the different fleet segments. LIFE calls on STECF and the Commission to further analyse this and seek ways to develop systems that are fair, accountable and fit for purpose, while engaging stronger action against overcapacity and technological creep.

As evidence we submit

- h. EC study on engine power verification by Member States <https://op.europa.eu/en/publication-detail/-/publication/a867cbac-8e90-11e9-9369-01aa75ed71a1>
- i. Review of the management of the motor power and gear area Danish Fisheries Agency June 2024: <https://fvm.dk/Media/638551643928914259/Gennemgang%20vedr.%20forvaltning%20af%20motorkraft-%20og%20redskabsomr%C3%A5det.pdf>

4. Ineffective and insufficient regionalisation and stakeholder involvement

The State of Play

Getting the governance right is one of the key challenges facing fisheries today. The challenge is ever more complex given the development of the blue economy and the need to accommodate new economic sectors (aquaculture, tourism, renewable energy, etc.) within areas traditionally occupied by fisheries.

Although Regionalisation and increased stakeholder involvement are key elements highlighted in the current CFP, and represent improvements with respect to previous CFPs, its implementation is not done effectively and sufficiently. Stakeholder involvement is basically done by formal consultations and advice in key moments, rather than having a continuous and meaningful engagement in all stages, from the policy design up to its implementation.

On the issue of getting the advice of stakeholders through the ACs, although the EC has laid down detailed rules on the functioning of the ACs in Delegated Regulation EU 2015/242 of October 2014, highlighting that “it is necessary to ensure small-scale fisheries (SSF) efficient participation in the work of the Advisory Councils, including by contributing to the costs and loss



of income that such participation may entail”, and emphasising “The number of representatives of small-scale fleets should reflect the share of small-scale fleets within the fishing sector of the Member States concerned”, and while specific financial support in the past for the improved engagement of the SSF in the ACs were proven to be quite effective, there remain barriers when it comes to the participation of SSF in most of the existing ACs, and several SSF organisations previously engaged are dropping their participation as they don’t see it’s worth the effort.

These reasons include the lack of dedicated SSF organisations due to reasons appointed above, but when they exist, their voice is still prevented to be heard appropriately. While small-scale coastal fishery (SSCF) stakeholders in the under 12 metre vessel fleet using non-towed gear are currently represented through various associations in a range of advisory councils, normally through mixed fleet member organisations, in our experience, the representation of dedicated small-scale fishing interests and the stakeholder engagement from this fleet segment is limited. Across the existing 11 Advisory Councils, the ExCom Chair, General Assembly Chair and Working Group Chairs rarely, if ever, come from dedicated small-scale fishing associations or producer organisations. Notably, in most of the ACs we have found an impenetrable barrier that prevented SSF delegates from joining the ExComs, even despite the existence of dedicated empty seats to SSF. This has the effect that in final ACs advice SSF views are not appropriately taken into account and that in stakeholder consultation meetings with the Commission and Member States or the regular dialogues there are few -if any- small-scale fishing representatives at the table. Also, this frustration over the years has brought many SSF to finally drop their participation at the ACs as they don’t see worthed the effort.

What it is needed

LIFE believes that fisheries management in European seas should be fitted to the geographical scale that matters to every particular fishery, and people who exploit natural resources should be central to decision-making on how these resources are used and managed. Part of the solution lies in decentralised co-management model per fishery and for reserved areas dedicated to small-scale inshore fisheries, and the devolution of power to fishers/fishers’ associations, scientists and NGOs (on equal footing with the public administration). A co-management approach is particularly appropriate for SSF given their heterogeneous, seasonally diverse, and polyvalent nature; operating as they do in different socio-political structures, and targeting a variety of demersal and pelagic fisheries, whilst incorporating pre-harvest, harvest and post-harvest activities. Co-management is not particularly addressed in the current CFP but neither are MS prevented from adopting this approach in their waters. Certain Member States and regions have a legal framework for co-management; to date, however, there is no legislation at European level and only a few tools facilitating the implementation of co-management (or participative management) mechanisms, although co-management is being used to manage some fisheries in a number of EU Member States, applying rules that fit in perfectly with the current CFP. The general principle of fisheries co-management can be facilitated through support and guidelines at both European and national level, as the European Parliament Resolution on “co-management of fisheries in the EU and the contribution of the fisheries sector for the implementation of management measures” ([2022/2003\(INI\)](#)), stated.

The current Advisory Councils, while relevant and potentially useful, are not appropriate co-management bodies. They are structures made up of high-level representatives from different



sectors. They do not include the actors directly engaged in fishing or in the management of the different fisheries. They are consultative forums, and not capable of fulfilling fisheries co-management functions. However, Advisory Councils are very relevant forums to understand and receive advice on the views of the different stakeholders and need to be continuously strengthened.

To redress the problem of the lack of engagement of the SSF, it is vital that the SSF sector is supported to establish appropriate dedicated small-scale Fish Producer Organisations (POs) as mentioned in the first point. In parallel, building on the work of the existing 11 advisory councils, which represent a range of geographical areas, fleet segments and fishery stakeholder interests, we feel it is necessary and timely to launch an additional AC dedicated to Small-scale Fishing. This would be dedicated to the specificities of the small-scale coastal fleet (as defined in Article 2.14 regulation 2017/1004) and related value chains. In the same way that a Pelagic Advisory Council or an Aquaculture Advisory Council are able to focus stakeholder engagement on a particular fleet segment or fishery interest, the new AC would enable small-scale fishers to have a forum in which their specificities can be discussed through relevant SSF agenda items, providing relevant advice to the Commission and Member States and improving outcomes for fishery management and conservation objectives, and the SSF would feel it's worthwhile to engage in. For this to become a reality LIFE calls for the amendment of Article 43 and Annex III, to add a new Advisory Council for Small-scale fisheries, whose main area of competence would be all small-scale fisheries and related value chains, as defined in Article 2.14 regulation 2017/1004.

As evidence, we submit:

4. Resolution on co-management of fisheries in the EU and the contribution of the fisheries sector for the implementation of management measures ([2022/2003\(INI\)](#))
5. The LIFE Report on “Co-management for Small-scale Fisheries: Principles, Practices and Challenges” <https://lifeplatform.eu/wp-content/uploads/2021/02/LIFE-Co-Management-for-SSF-compressed.pdf>
6. The LIFE Report on “On the Road to Participative Governance of Marine Resources” https://lifeplatform.eu/wp-content/uploads/2023/03/shrunkOn-the-Road-to-Participative-Governance-of-Marine-Resources-30-Dec-2022_compressed.pdf
7. Technical report of the EU-funded Pilot Project ‘Support Measures for Small-Scale Fishing’ - Baltic and North Sea (Agreement Number MARE/2014/04 – SI2.727556) https://lifeplatform.eu/wp-content/uploads/2018/06/LIFE_BANS_Final_Technical_Report.pdf

5. To what extent is the CFP relevant to current and emerging needs

Increasingly, EU small-scale fishers are having to face numerous important challenges that keep adding pressure and eroding their viability and resilience. Climate change, pollution and increased use of Marine Space/ spatial squeezing and other causes pose major challenges to overcome. Increasing geopolitical tensions, vulnerable international agreements, and conflicts are creating uncertainty, disrupting supply chains and markets, and undermining food security.



The EU's dependence on international supply chains and on fishery products produced outside its EEZ, makes it highly vulnerable to such disruption. A greater share of EU fishery production needs to be dedicated to supplying EU consumers with fish, with fishery production for human consumption prioritised over production for the reduction industry, to be transformed into fishmeal and fishoil.

The CFP implementation needs to be aligned and coherent with other policies to ensure they are implemented in a coordinated fashion, putting an end to the practice of working in silos by different departments. In particular, LIFE sees an opportunity for the Ocean Pact to provide an overarching framework that:

1) places once and for all, small-scale fisheries at the heart of the Blue Economy by adopting a differentiated approach to SSF and Large-Scale Fisheries (LSF), with ring fenced rights for SSF that would provide our sector with access to resources and markets, protected from the encroachment and erosion by LSF and by very powerful blue economy sectors. We call for the reservation of the 12-mile zone in Europe as a regenerative area to offset the impacts of boosting the Blue Economy and of off-shore fishing, and as an exclusive fishing zone for small-scale low impact fishing.

2) improve the implementation and strengthen the enforcement of existing legislation and policies -including MSFD, CFP and new laws like Nature Restoration Law and adopt practical and workable infringement proceedings against MS or EU institutions when legal frameworks are not implemented.

3) Ensure policy coherence and appropriate governance to restore and maintain the ocean's good environmental status; the short-term goals should be improvement, while avoiding damage. Coherence and precaution are needed when "boosting the Blue Economy", making sure there are no effects to the state of the ecosystem and the existing low impact and high social value blue economy actors, such as Small-scale fishers. We call for a "blue doughnut" approach to the Blue Economy, building on the social foundations and respecting ecological boundaries. This will bring coherence and identify compatibility between blue economy sectors. We need to strengthen and make Marine Spatial Planning inclusive, so that SSF are able to effectively participate in designing user spaces, with a clear plan for Integrated Coastal Management effectively addressing land and sea interactions.

Shifting to a circular economy and from fossil fuel dependency to a zero-carbon economy is as imperative for fisheries as it is for other production sectors. If the vision of the fisheries of the future is well framed and the energy transition is well aligned with the CFP objectives to end overfishing, conserve and restore the marine environment, and is consistent with the objectives of achieving economic, social and employment benefits, it could provide a great opportunity to provide better working conditions, revitalise the small-scale low impact fishing sector, attract new entrants to the sector and give them prospects of future.

As evidence we submit:

- LIFE's views on the Ocean Pact: <https://lifepatform.eu/lifes-views-on-the-ocean-pact/>
- Currently, LIFE is engaged in providing the input to the Roadmap for the Energy Transition of the Fisheries and Aquaculture Sector. In the meantime, we submit LIFE's



perspective on Energy Transition and Decarbonisation of the fishing fleet:
https://lifeplatform.eu/wp-content/uploads/2024/04/1_Energy-Transition-and-Decarbonisation-LIFE-Statement-with-cover-page-1.pdf

Final conclusions

In the longer term, fishing faces numerous challenges, including evolving from a 20th century extractive activity, into a fit-for-purpose 21st-century sustainable seafood producing sector as part of the rapidly developing Blue Economy. However, as yet there is no common understanding or vision of what a sustainable and zero-carbon seafood production sector should look like in 2050 or what role fishing will play in the Blue Economy. What is clear, seafood production and fishing must change in line with sustainability necessities and blue economy development, and as such will be markedly different in 2050 compared to today. Without a clear alternative vision, the direction of travel - or rather drift - would seem to be towards algae, aquaculture, synthetic protein, surimi and analogue fish all playing a larger role, and fishing a much smaller role. Also with climate change, biodiversity loss and other environmental impacts changing the availability of traditional stocks. This drift must be halted, as these products don't provide in themselves a sustainable solution either. It needs courage and imagination to envision and plan for an alternative future. LIFE's vision is one where small-scale and low impact fisheries play a much more central role in food security, as they did for centuries, anchoring socio-economic activity in coastal communities, and as key agents of change towards better managed, more productive, sustainable fisheries. We are deeply convinced that small-scale low impact fisheries are part of the solution and a gamechanger to Europe's ailing seas and could make a vital contribution to implementing the Green Deal agenda for 2030 and 2050, in line with the United Nations 2030 Agenda for Sustainable Development and the Sustainable Development Goals.